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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE

In re:  
DEENER NEWBERRY  
Debtor(s)

Chapter 13

Case No. 15-29455-L

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NOTICE OF HEARING

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The Chapter 13 Trustee's Objection To Confirmation having been filed by Sylvia Ford Brown on November 23, 2015.

NOTICE IS HEREBY GIVEN THAT:

The Chapter 13 Trustee's Objection To Confirmation shall be held on December 17, 2015, at 9:00 am in the United States Bankruptcy Court, Room 600, 200 Jefferson Avenue, Memphis, Tennessee, 38103.

Debtors should contact their attorney to see if their attendance is necessary. This hearing may be continued or adjourned from time to time by oral announcement (at the hearing) of the continued or adjourned date and time, without further written notice.

/s/ Sylvia Ford Brown  
CHAPTER 13 TRUSTEE

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OBJECTION TO CONFIRMATION

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Comes now your Standing Chapter 13 Trustee who would show unto the Court the following for which relief is sought:

1. It is reasonably believed and the proof will show that:  
The Chapter 13 Petition and plan fail to comply with 11 U.S.C. §1325 (a)(3) which requires that the plan be proposed in good faith. The Chapter 13 Petition and plan fail to comply with 11 U.S.C. §1325 (4) which states that unsecured claims should receive a greater distribution than would be received under a Chapter 7 proceeding. DEBTOR'S MORTGAGE WAS SET UP WITHOUT A MONTHLY PAYMENT.

2. Because the petition fails to comply with applicable provisions of the Bankruptcy Code, the confirmation should be denied and the debtor given an opportunity to submit a modified plan within a reasonable time.

PREMISES CONSIDERED, your Chapter 13 Trustee prays:

1. That the Court set this objection for a hearing.
2. That the Court deny confirmation and grant the debtor a reasonable time in which to submit the modified plan.
3. That the Chapter 13 Trustee be granted such other and further relief to which he or she may be entitled.

/S/ Sylvia Ford Brown  
CHAPTER 13 TRUSTEE

CC: CHAPTER 13 TRUSTEE  
SZ

DEENER NEWBERRY  
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TED I JONES ATTORNEY

All Entities On Matrix